

Exhibit 20

Aaron Richard Golub, Esquire, P.C.
Lawyers

24 East 64th Street- Fifth Floor
New York, New York 10065

(212) 838-4811
Facsimile (212) 838-4869

July 21, 2023

VIA ECF

The Honorable P. Kevin Castel
United States Courthouse
Courtroom 11D
500 Pearl Street
New York, New York 10007

Re: Brian Donnelly AKA KAWS et al v. Jonathan Anand et al,
Civil Action No. 1:21-cv-09562 (PKC) (BCM)

Dear Judge Castel:

This office represents Plaintiffs in the above-captioned action. This letter concerns the Order, dated July 21, 2023 (the "Order") (Dkt. 118), which Plaintiffs respectfully believe contains a typographical error and an inadvertent omission with respect to the portion of the Order concerning Plaintiffs' First Set of Interrogatories.

Interrogatories Nos. 3-21

On page 3 of the Order, in addition to ordering Defendant Jonathan Anand ("Anand"), inter alia, by August 14, 2023, to "produce all documents responsive to each category of Plaintiffs' First Request for Documents," the Court ordered Defendant Anand to "fully respond to Interrogatories Nos. 13-21" (emphasis supplied). Plaintiffs respectfully believe that the Court intended to write "Interrogatories Nos. 3-21" instead of "Interrogatories Nos. 13-21" (emphasis supplied).

Also on page 3 of the Order, the Court holds that 19 of Defendants' 23 Interrogatory Responses merely state "Not Applicable" in violation of FRCP 33(b)(4), as follows:

"Anand's Interrogatory Responses fair no better. In the case of 19 of the 23 Interrogatories, Anand has stated without explanation that the Interrogatory is 'Not Applicable.' (See Response to Interrogatories Nos. 3-21.) An objection to an interrogatory 'must be stated with specificity.' Rule 33(b)(4), Fed. R. Civ. P." (emphasis supplied).

Accordingly, it appears that the Court intended to overrule Defendant Anand's Objections to Plaintiffs' First Set of Interrogatories Nos. 3-21 instead of Nos. 13-21 and order full responses thereto.

*The Order of July 21, 2023
is modified to delete the
reference to "Interrogatories
13-21" and in its
place insert
"Interrogatories 3-21."
in paragraph
No. 2 on p. 3.*

*The omission of
Interrogatories
1, 2, 22 and
23
was
inadvertent
SO ORDERED
VSD
7-25-23*

Aaron Richard Golub, Esquire, P.C.

The Honorable P. Kevin Castel
July 21, 2023

Interrogatories Nos. 1, 2, 22 and 23

The Order discusses Defendant Anand's Responses to Interrogatories Nos. 3-21, but does not reference Defendant Anand's Responses to Interrogatories Nos. 1, 2, 22 and 23.

As argued at length in Plaintiffs' counsel's letter, dated June 27, 2023 (Dkt. 116) (pp. 24-25 and 32-33), Defendant Anand's Responses to Interrogatories Nos. 1, 2, 22 and 23 contain the same flippant, terse responses as those criticized elsewhere in the Order, including: "None" and "Online." Moreover, in response to Plaintiffs' Interrogatories Nos. 1-2—requesting the specific identity of each "whole seller" and "e-commerce website" expressly referenced in Defendant Anand's Second Affirmative Answer—Defendant Anand flagrantly invites Plaintiff to visit ebay.com, amazon.com, alibaba.com, aliexpress.com and dhgate.com and "enter KAWS on search bar." Defendant Anand's Responses are patently deficient.

Accordingly, Plaintiffs respectfully request that the Court rule on Defendant Anand's deficient Responses to Interrogatories Nos. 1, 2, 22 and 23.

Respectfully Submitted,



Russell I. Zwerin
Counsel for Plaintiffs

cc: Law Offices of Sanjay Chaubey (via ECF)